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9 In re RIPPLE LABS INC. LITIGATION,

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12 This Document Relates To:
13 ALL ACTIONS
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18 Case No. 18-cv-06753-PJH
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STIPULATION AND [PROPOSED] ORDER GRANTING ADMINISTRATIVE MOTION TO RELATE AND CONSOLIDATE CASES FOR PRETRIAL PURPOSES AS MODIFIED BY THE COURT

1 Pursuant to Civ. L.R. 7-11(a) and 7-12, the undersigned parties hereby stipulate as follows:

2 **WHEREAS**, on July 27, 2020, the case captioned *Simmons v. Ripple Labs, Inc.*, No. 20-cv-
3 5127-KAW, was transferred to this District from the Southern District of New York, *Simmons*, ECF
4 16 at 1;

5 **WHEREAS**, the complaint in *Simmons* involves claims, allegations, and parties that are
6 substantially similar to the operative complaint in *In re Ripple Labs Litigation*;

7 **WHEREAS**, all the affected parties in both actions—specifically, Defendants Ripple Labs
8 Inc., XRP II LLC, and Bradley Garlinghouse, Lead Plaintiff Bradley Sostack, and Plaintiff Daniel
9 Simmons—hereby stipulate that *Simmons* is related to the putative class action *In re Ripple Labs*
10 *Litigation* pending before the Court;

11 **NOW, THEREFORE, IT IS HEREBY STIPULATED** by and between Lead Plaintiff
12 Bradley Sostack, Plaintiff Daniel Simmons, and Defendants Ripple Labs, Inc., XRP II LLC, and
13 Bradley Garlinghouse, through their respective counsel, that:

- 14 1. The *Simmons* action is related to *In re Ripple Labs Litigation* and, under the Court's
15 standing order, Dkt. 35 at ¶¶ 6-7, that it should be consolidated therewith.

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17 Dated: August 6, 2020

18 By: /s/ P. Ryan Burningham
19 P. Ryan Burningham (*pro hac vice*)
SUSMAN GODFREY L.L.P.
20 1201 Third Avenue, Suite 3800
Seattle, WA 98101
21
22 *Counsel for Lead Plaintiff*
Bradley Sostack

By: /s/ Menno Goedman
Menno Goedman
BOIES SCHILLER FLEXNER LLP
1401 New York Ave. NW
Washington, DC 20005

Counsel for Defendants Ripple Labs, Inc.,
XRP II LLC, and Bradley Garlinghouse

23 By: /s/ Ross E. Pitcoff
24 Ross E. Pitcoff
ROSS PITCOFF LAW
25 387 Park Avenue South, 5th Floor
New York, NY 10016
26
27 *Counsel for Plaintiff*
Daniel Simmons

Pursuant to the foregoing stipulation, **IT IS SO ORDERED**. The court directs the clerk to take all action prescribed to it under paragraph 7 of this court's March 18, 2019 order regarding publication of notice (Dkt. 35).

Dated: August 21, 2020



SIGNATURE ATTESTATION

I, Menno Goedman, hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized its filing.

By: /s/ Menno Goedman
Menno Goedman